

STATEMENT OF BASIS (AI No 19557)

for draft Louisiana Pollutant Discharge Elimination System permit No LA0069507 to discharge to waters of the State of Louisiana

THE APPLICANT IS Intercoastal Barge Cleaning, Inc
P O Box 10306
Jefferson, LA 70181

ISSUING OFFICE Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821 4313

PREPARED BY Yvonne Baker

DATE PREPARED September 8, 2008

1 PERMIT STATUS**A Reason For Permit Action**

Permit reissuance of an Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5 year term

B NPDES permit – NPDES permit effective date N/A
NPDES permit expiration date N/A
EPA has not retained enforcement authority

C LPDES permits – LA0069507
LPDES permit effective date October 1 2003
LPDES permit expiration date September 30, 2008

D Date Application Received October 12, 2007

2 FACILITY INFORMATION**A FACILITY TYPE/ACTIVITY** barge cleaning and repair facility

The facility cleans and repairs barges containing the following steam coal, calcine coke, grain, salt, wood chips iron ore, scrap steel rock, and urea The barges are washed with river water after the material has been unloaded and swept out The washwater is then pumped overboard back into the river This facility discharges dry commodity and coal and coke barge / vessel washwater and ballast water directly to the Mississippi River

B FEE RATE

- 1 Fee Rating Facility Type minor
- 2 Complexity Type II
- 3 Wastewater Type III
- 4 SIC code 4491 3731, 2841

C LOCATION off Highway 611 1 River Mile 105 15 on the East Bank of the Mississippi River
in Jefferson, Jefferson Parish
Latitude 29° 57' 18" Longitude 90° 09' 37"

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3 OUTFALL INFORMATION

Outfall 001

Discharge Type dry commodity barge / vessel washwater
Treatment none
Location at the point of discharge from the barge / vessel being washed
Flow intermittent
Discharge Route to the Mississippi River

Outfall 003 – THIS OUTFALL HAS BEEN DELETED

In accordance with LAC 33 IX 2511 A 1 discharges composed of storm water “ shall be required to obtain an LPDES permit except discharges associated with industrial activity ” In accordance with LAC 33 IX 2511 B 14, facilities classified as SIC code 4491 are considered to have stormwater discharges associated with industrial activity

Due to good compliance history in years 2006 and 2007 outfall 003 has been deleted and will be addressed through a stormwater pollution prevention plan and Barge BMPs

Outfall 005

Discharge Type coal and coke barge / vessel washwater
Treatment none
Location at the point of discharge from the barge / vessel being washed
Flow intermittent
Discharge Route to the Mississippi River

Outfall 006 – THIS OUTFALL HAS BEEN RENUMBERED TO 06A

This outfall was renumbered to be consistent with other facilities

Outfall 06A

Discharge Type incoming ballast and void water from customer barges
Treatment none
Location at the point of discharge from the customer barge wing/void tanks
Flow intermittent
Discharge Route to the Mississippi River

Outfall 06B

Discharge Type maintenance and dry dock ballast and void water
Treatment none
Location at the point of discharge from the work barge wing/void tanks
Flow intermittent
Discharge Route to the Mississippi River

Outfall 007 – THIS OUTFALL HAS BEEN RENUMBERED TO 06B

This outfall was renumbered to be consistent with other facilities

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Outfall 008 – THIS OUTFALL HAS BEEN DELETED

The facility no longer discharge treated sanitary wastewater due to installation of Port o lets

4 RECEIVING WATERS

STREAM

BASIN AND SEGMENT Mississippi River Basin, Segment 070301

DESIGNATED USES a primary contact recreation
 b secondary contact recreation
 c propagation of fish and wildlife
 d drinking water supply

5 TMDL STATUS

The discharges from Intercoastal Barge Cleaning, Inc are to the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6 PROPOSED EFFLUENT LIMITS

BASIS See Rationale below

Changes from previous permit

- 1 Outfalls 003 and 008 have been deleted
- 2 Outfall 006 was renumbered to Outfall 06A
- 3 Outfall 007 was renumbered to Outfall 06B
- 4 The descriptions for Outfalls 001 and 005 were updated

7 COMPLIANCE HISTORY/COMMENTS

- 1 OEC – There are no open enforcement actions or inspections on file at LDEQ
- 2 DMR Review/Excursions – A DMR review of years 2006 and 2007 noted no exceedances in permit limitations

8 EXISTING EFFLUENT LIMITS

Outfall 001 grain, salt wood chips iron ore scrap steel, rock and urea barge washwater

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities including grain salt wood chips iron ore, scrap steel rock and urea. Best Management Practices (BMPs) for barge operations are listed in Part II.

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Outfall 003 uncontaminated stormwater runoff from the spar barge

Pollutant	Monthly Average	Daily Maximum	Frequency
Flow	--	Report	1/quarter
TOC	-	50 mg/L	1/quarter
Oil & Grease		15 mg/L	1/quarter
pH Min/Max Values	6.0 (min)	9.0 (max)	1/quarter

Outfall 005 steam coal and calcine coke barge washwater

Pollutant	Monthly Average	Daily Maximum	Frequency
Flow	Report	Report	1/week
TSS	Report	Report	1/month
COD	250 mg/L	400 mg/L	1/week
pH Min/Max Values	6.0 (min)	9.0 (max)	1/week

Outfall 006 incoming ballast water from customer barges

Pollutant	Monthly Average	Daily Maximum	Frequency
Flow	Report	Report	1/week
COD		250 mg/L	1/week
Oil & Grease	-	15 mg/L	1/week
pH Min/Max Values	6.0 (min)	9.0 (max)	1/week

Outfall 007 maintenance and dry dock ballast water from the work treatment spar, and office barges and the dry dock

Pollutant	Monthly Average	Daily Maximum	Frequency
Flow	Report	Report	1/week
COD		250 mg/L	1/week
Oil & Grease		15 mg/L	1/week
pH Min/Max Values	6.0 (min)	9.0 (max)	1/week

Sampling for Outfall 007 is only required if a visible oil sheen is present

The measurement frequency for Outfall 007 for the discharge of maintenance and dry dock ballast water shall be 1/month whenever sampling is required instead of 1/week as stated above

Outfall 008 treated sanitary wastewater

Pollutant	Monthly Average	Weekly Average	Frequency
Flow	Report	Report	1/ month
BOD ₅		45 mg/L	1/ month
TSS		45 mg/L	1/ month
Fecal Coliform	-	400 col/100ml	1/ month
pH Min/Max Values	6.0 (min)	9.0 (max)	1/ month

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9 ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U S Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10 HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits," no consultation with the Louisiana State Historic Preservation Officer is required.

11 TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12 PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Intercoastal Barge Cleaning, Inc

1 Outfall 001 dry commodity barge / vessel washwater

Based on BPJ and on permits for similar facilities and previous permit no effluent limitations are established for washwaters from barges previously containing dry commodities including grain, salt, wood chips iron ore scrap steel rock, and urea Best Management Practices (BMPs) for barge operations are listed in Part II

2 Outfall 005 coal and coke barge / vessel washwater

<u>Pollutant</u>	<u>Limitation</u> Mthly Avg Daily Max (mg/l)	<u>Reference</u>
Flow MGD	Report Report	LAC 33 IX 2701 I I b
COD	250 400	Similar Discharges, BPJ, previous permit
TSS	Report Report	Similar Discharges, BPJ, previous permit
pH	6 0 9 0 s u	Similar Discharges BPJ, previous permit

BPJ Best Professional Judgment

Treatment none

Monitoring Frequency TSS shall be observed once per month and Flow, COD and pH shall be observed once per week at the point of discharge from the barge / vessel being washed

Limits Justification Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities and the previous permit

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- 3 **Outfall 06A** incoming ballast and void water from customer barges
 Outfall 06B maintenance and dry dock ballast and void water

<u>Pollutant</u>	<u>Limitation</u> Mthly Avg Daily Max (mg/l)	<u>Reference</u>
Flow MGD	Report Report	LAC 33 IX 2701 I 1 b
COD	250	Similar Discharges, BPJ, previous permit
Oil and Grease	15	Similar Discharges, BPJ, previous permit
pH	6 0 9 0 s u	Similar Discharges, BPJ, previous permit

BPJ Best Professional Judgment

Treatment none

Monitoring Frequency Flow COD Oil & Grease and pH shall be observed once per week at the point of discharge from the incoming customer barge/vessel

*The measurement frequency for Outfall 06B for the discharge of maintenance and dry dock ballast and void water shall be 1/month whenever sampling is required

Limits Justification Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities and the previous permit

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442 because in accordance with 40 CFR 442.1(a) "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility cleans barges and vessels containing dry commodities only. This facility does not clean barges and vessels containing chemical petroleum or food grade cargos as defined in 40 CFR 442.

Storm Water Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit because in accordance with LAC 33 IX 2511 A 1, storm water discharges shall not be required to obtain an LPDES permit " except discharges associated with industrial activity " In accordance with LAC 33 IX 2511 B 14 a-k facilities classified as SIC code 4491 3731, 2841 are considered to have storm water discharges associated with industrial activity

The SWP3 shall be prepared, implemented and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the permit)